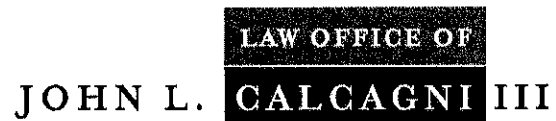


ATTACHMENT A

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January 17, 2023

Molly Picozzi
Sentencing Guideline Specialist
United States Probation Office
District of Rhode Island
2 Exchange Terrace, 3rd Floor
Providence, RI 02903
Molly_Picozzi@rip.uscourts.gov

Re: United States v. Dominique Golden, Case No. 1:19-CR-00115-JJM-LDA

Dear Ms. Picozzi:

I hope this letter finds you well. Below please find my suggested edits and/or objections to your draft Presentence Investigation Report (PSR) in the above matter.

1. On page 2, under Identifying Data, please correct "No high school diploma or GED" to reflect that Ms. Golden has both a GED and a CNA Certificate.
2. In paragraph 13, the property listed (two vehicles, jewelry, cash, and two handguns) does not have a combined value of "\$1,263,822.54." Therefore, the reference to this dollar amount should be removed.
3. In paragraph 53, in the last sentence, please change the pronoun "his" to "her."
4. In paragraph 65, in the first sentence, please change the pronoun "his" to "her." Also, in the second sentence, please change the pronoun "he" to "she."
5. In paragraph 66, in both the fourth and fifth lines, please change the pronoun "his" to "her."
6. In paragraphs 84 and 139, Defendant reserves right to argue that her criminal history category III overstates the seriousness of her criminal background. Had her case in the District of Rhode Island been resolved before the related matter in the Northern District of Georgia, she would appear before the Court at the time of sentencing with a criminal history category I. At the time of her arrest in this District, she had not yet been charged in Georgia. Once charged in Georgia, she was ordered into pretrial custody and denied



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bail. This precluded her from appearing before this Court to resolve the instant matter in a timely manner.

7. In paragraph 104, please amend Joshua Roberts' work history. He worked for his mother, who owns health care clinics in London, Africa, and Ghana. According to the Defendant, Mr. Roberts worked with and for his mother coordinating logistics related to providing medical supplies for these clinics.
8. In paragraph 106, please amend the text to reflect that Ms. Golden and Mr. Roberts presently plan to hold off on any divorce decisions or proceedings at this time. Once they are both released from custody, they will attempt to reconcile their differences and work on the marriage. If unsuccessful, then they will dissolve the marriage.
9. In paragraph 115, please amend the text to reflect that Ms. Golden withheld information about her mental health history during her pretrial services interview due to fear attributed to how disclosing such information would adversely impact her case and/or ability to be released on bail. As for the evaluation at Ben Taub Hospital, this was completed in approximately 2016.
10. In paragraph 118, please amend the text reflect to correct Wisdom. The person Ms. Golden referenced during the presentence interview is her co-defendant in the Rhode Island case, who is Wisdom Oghenekaro Onyobeno. This is the man with whom she formed a relationship and who assisted her in the various manners described. The Wisdom she described is not Darius Sowah Okang aka" Wisdom. Similarly, footnote 8 should either be removed or edited to reflect to correct Wisdom, as described herein.
11. In paragraph 127, please amend the text to reflect that Ms. Golden withheld information about her drug use history during her pretrial services interview due to fear attributed to how disclosing such information would adversely impact her case and/or ability to be released on bail.
12. In paragraph 129, please amend the text to reflect that Ms. Golden earned her GED from Itawamba Community College.

Please contact me should you wish to discuss these proposals/objections any further. I am hopeful you will take what I believe to be rightful steps to correct the PSR in its existing form.

Thank you for your prompt and courteous attention to this correspondence.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Calcagni III', written over a horizontal line.

John L. Calcagni III, Esq.

C: AUSA Denise Barton – denise.barton@usdoj.gov

Client

JC/nd